REMARKS

In response to the Office Action dated April 5, 2005, Applicant respectfully requests reconsideration and withdrawal of the rejections of the claims.

To remove the basis for the objections set forth in items 1 and 2 of the Action, the specification has been amended to add reference number 22 and correct the typographical error noted by the examiner. Other typographical errors have also been corrected.

Claims 1-11 were rejected under 35 U.S.C. §103, on the grounds that they were considered to be unpatentable over the Toda patent (U.S. 5,859,954) in view of the McIntyre patent (U.S. 6,690,478). Claim 12 was rejected on the basis of these two patents, in further view of the Isoda patent (U.S. 6,249,835). It is respectfully submitted that these patents do not suggest the claimed subject matter to a person of ordinary skill in the art, whether they are considered individually or in combination.

Claim 1 recites a print object converter comprising, among other elements, an intermediate data generator for generating intermediate data of a print object to be printed, and a classification table generator for generating an object classification table of the print object in parallel with the generation of the intermediate data. The Office Action asserts that the Toda patent teaches an intermediate data generator, for instance with reference to column 5, lines 15-19, and a classification table generator, with reference to Figures 3A, 3B, 5A and 5B. It is respectfully submitted, however, that the Toda patent does not disclose both an intermediate data generator and a classification table generator. In particular, the data represented in Figures 3A, 3B, 5A and 5B is not classification data that is generated "in parallel with the generation of the intermediate data." Rather, the data represented in these figures is

the intermediate data itself. See, for example, column 5, lines 49-52, 57, and 61-62, in which data items 3011-3014, 3021 and 3022 are described as "intermediate-language" data items. Since these items constitute the intermediate data, per se, they cannot also be considered to be classification data that is generated in parallel with the intermediate data.

Nevertheless, even if the data illustrated in Figures 3A, 3B, 5A and 5B could be considered to be classification data, it is respectfully submitted that the references still would not teach the claimed subject matter. Another element recited in claim 1 is a PDL selector for selecting one PDL from among a plurality of PDLs using the object classification data. The Office Action acknowledges that the Toda patent does not teach this claimed subject matter. Rather, the Toda patent only discloses that a host computer 101 sends PDL data to the printer controller 102, which then converts this data into intermediate language data. It does not discuss the possibility that multiple PDLs could exist, let alone the selection of one PDL from a plurality of PDLs.

To this end, therefore, the Office Action relies upon the McIntyre patent. While this patent generally discloses the concept of selecting a PDL from among more than one PDL, any logical application of this teaching to the system of the Toda patent does not result in the claimed invention. Claim 1 recites that the selection of one PDL from among a plurality of PDLs is performed by "using the object classification table." According to the Office Action, the object classification table corresponds to the data represented in Figures 3A, 3B, 5A and 5B of the Toda patent. However, this data is generated after the PDL data has been generated in the host computer 101 and transmitted to the printer controller 102. Conversely, the

selection of a particular PDL, in accordance with the teachings of the McIntyre patent, must occur in the host 101 <u>before</u> the PDL data is transmitted to the printer controller. As a result, the selection of a particular PDL cannot be made "using the object classification table," i.e., the tables shown in Figures 3A, 3B, 5A and 5B of the Toda patent.

Consequently, even if the tables shown in the noted figures of the Toda patent are considered to be classification tables in the system of that patent, and the teachings of the McIntyre patent are applied to such a system, any logical combination of their teachings would not lead one to the claimed subject matter. Specifically, the combined teachings of the references do not suggest a print object converter in which one PDL is selected from among a plurality of PDLs using an object classification table that is generated in parallel with the generation of intermediate data. Accordingly, the references cannot be considered to teach the subject matter of claim 1.

While the foregoing discussion has focused upon the recitations of claim 1, it is respectfully submitted that independent claims 4 and 7 are likewise patentably distinct from the teachings of the Toda and McIntyre patents, for at least the same reasons. Furthermore, the dependent claims recite additional distinguishing features of the invention that are neither disclosed nor suggested by the references. A detailed discussion of these additional features is submitted to be unnecessary at this time, given the fundamental difference described above.
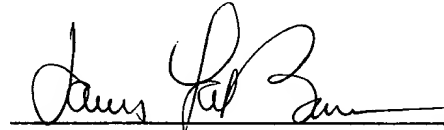
Reconsideration and withdrawal of the rejections, and allowance of pending claims 1-12 is respectfully requested.

Respectfully submitted,

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Date: 7-1- 05

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